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ABSTRACT

To examine how the Hazelwood decision (Hazelwood School District versus Kuhlmeier) affected high school advisers' views of their role in controlling content in their school newspapers and what they see as objectionable content, a study surveyed 100 Missouri high school advisers randomly selected from a list of 573 Missouri public high schools (with a 56% response rate). Each respondent was sent a cover letter and a 34-item questionnaire. Results indicated that schools have a variety of meahs for controlling newspaper content, but that there was no significant difference between advisers at small and large schools on the questions concerning how advisers oversee their newspapers' content. School size did appear to be related to the type of controversial articles that appeared in school papers, however. In addition, findings indicated that the Hazelwood decision would not affect the content of school publications. A table provides responses of advisors to 16 of the survey questions. (MM)

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HOW ADVISERS VIEW THE STATUS OF HIGH SCHOOL PRESS FREEDOM FOLLOWING THE HAZELWOOD DECISION

A Paper Presented to the Secondary Education Division
of the AEJMC for the 1989 Convention

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How Advisers View the Status of High School Press Freedom Following the Hazelwood Decision

The January 1988 Supreme Court decision in Hazelwood School District v. Kuhlmeier seems to allow a school administrator considerable discretion in deciding what can be published. In the 5-3 ruling, the court said that principals could censor school publications because "a school need not tolerate student speech that is inconsistent with its basic educational mission." The decision was the result of an action by the principal at Hazelwood East High School in suburban St. Louis, Mo., to stop the school newspaper from publishing articles that he said invaded the privacy of students and parents.

In the Hazelwood case, the Supreme Court said that the principal had the right to censor high school publications because of the school's role as publisher, whether the publication is part of a class or an extracurricular project "so long as they are supervised by faculty members and designed to impart particular knowledge or skills to student participants and audiences."

The ruling seems to be inconsistent with rulings by courts of appeals over the past several years.[1] J. Marc Abrams and S. Mark Goodman [2] concluded that the ruling would close a public forum and greatly decrease freedom of speech; however, Louis A. Day and John M. Butler [3] argued that the decision was

sound constitutionally and put the high school press in its proper relationship with principals.

Despite the surprise of many observers over the ruling, researchers long have noted adviser and principal control of publications. More than 20 years before the Hazelwood case, Don D. Horine[4] had found that every adviser who responded said he/she read copy before publication, that all but 2% have edited copy, that only 14% said they never influenced editorial positions, and that only 36% had never censored news. In 1971, Laurence Campbell[5] in a nationwide survey found that 28% of advisers said advisers should be censors, 75% replied that advisers should read editorial copy before publication, and 68% said advisers should always read galley proofs for high school newspapers.

Robert Trager and Donna L. Dickerson[6] found that the extent of control varied depending upon size of the school involved. They found that large schools were more likely than medium-sized or small schools to review controversial material and that for all questions small schools put greater restrictions upon students' freedom of expression than did medium-sized schools, which were more restrictive than large schools.[7]

In a survey immediately following the Hazelwood decision, Thomas V. Dickson [8] found that Missouri principals did not expect to change the way they dealt with the school press because of the ruling. They said school newspapers were public forums but that they had in the past and would continue to censor articles on a variety of subjects.

This research is an attempt to understand how the Hazelwood decision affected high school advisers' view of their role in controlling content of their school newspapers and what they see as objectionable content. The research attempted to answer the following research questions: 1. Do schools control content of their school newspaper and, if so, do advisers in schools of different sizes have different views as to their roles in overseeing newspaper content? 2. What type of content is seen as objectionable, and does the type of content seen as objectionable vary depending upon size of the school? 3. Will the Hazelwood decision affect content of school newspapers and, if so, will it affect schools differently depending upon size?

The following hypotheses were proposed: 1. School size should be related to how the adviser sees her/his role in overseeing content of school newspapers; 2. School size should be related to the type of controversial articles that appear in school newspapers; 3. School size should be related to the effect the Hazelwood decision will have on school newspaper content.

Method

A questionnaire was sent to advisers at the same 100 Missouri high schools Dickson used in his survey of Missouri principals. The schools had been randomly selected from a list of the 573 Missouri public high schools. Each respondent was sent a cover letter, a four-page questionnaire with 34 questions, and a self-addressed stamped return envelope. Follow-up letters were sent. Fifty-six advisers returned the survey (response rate of 56 percent).

Results

Findings Related to Research Question No. 1

Only about a third of the advisers responding to the question (17 of 52) said they themselves had a stated policy about what topics could be included in the newspaper, and only a third of advisers (16 of 48) said their schools had a policy about what should not go into the newspaper. Only about a fifth (20.7%) of the school policies were written, according to the advisers in schools with policies. More than one-fourth (26.3%) of advisers who said their schools did not have a policy on the content of student publications stated that they did not want such a policy to be developed. There was no statistically significant difference among large and small schools for any of the questions about school policies except that larger schools were more likely to have policy that was written (chi square = 9.82, C = .503, significant at .01 level, df = 1).

Advisers did not usually ask the principal to look at the newspaper before publication. Only nine of the 51 advisers responding to the question (17.6%) said they ordinarily submit the newspaper or yearbook to the principal for his review prior to publication. (There was no statistically significant difference between large and small schools.)

All of the nine advisers who said they submitted the student publication to the principal for review said they did it "as a precaution in case problems arise." Eight of the nine also said they do it "as a courtesy." Seven of the nine also said they submit their newspaper or yearbook for review because they know

the principal wants to review it.

Only seven of the 51 advisers responding (13.7%) said that the principal had ever asked to review the entire newspaper or particular stories or photos that might be controversial. Most advisers, however, said they do submit potentially controversial material to the principal. Seventy percent (34) of the 49 advisers responding said that they had submitted stories or photos to get the principal's opinion about their suitability. There was no statistically significant difference in responses for advisers at large and small schools on either of the two questions.

Another way to control content is through restricting what types of stories are written. Few advisers, however, said they make story decisions themselves. Any control they exert over story selection appears to be by suggestion. Ninety-four percent of the 49 advisers answering (46) stated that they and the staff discuss possible stories before assignments are made. However, six of the advisers (11.1%) stated that they determine the topics of stories to be published. Ten advisers (18.5%) said the editors picks the topics, and the rest had other methods. There was no statistically significant difference between responses of advisers at large and small schools.

The most obvious way of controlling content is by outright censorship, which a majority of advisers said they had done. Twenty-seven of the 52 advisers responding (51.9%) said they had suppressed material. Fifty-five percent of the advisers in schools over 500 (12 of 22), and 50% of the advisers in

schools under 500 (15 of 30) said they had done so. The difference between responses of advisers based upon size of school was not statistically significant, however.

Seventeen of the 46 advisers responding to the question (37.0%) said they had suppressed material during the past 12 months. Seven of the 17 (41.2%) said they had done so once during the past year, while eight (47.1%) said they had done so twice and two (11.8%) said they had done so three or more times. There was no statistically significant difference based upon school size.

Findings Related to Research Question No. 2

Advisers were asked to rank the importance of the following purposes of a school newspaper: "as a classroom teaching tool," "as an open forum for student expression," "as a good-news publication for the school" or "as an extracurricular activity for students." Advisers ranked "as a classroom teaching tool" highest with a 1.5 on a 4-point scale with 1 being highest rating and 4 the lowest. They ranked "as a good-news publication" second with a 1.8 rating, "as an open forum for student expression" third with a 2.0 rating and "as an extracurricular activity for students" fourth with a rating of 3.1.

Size of school was a factor in the rankings. Advisers in no two of the three categories based on school size selected the same two purposes for first and second place. Advisers in all three categories, however, selected "as an extracurricular activity for students" as the least-important purpose. "As a good news publication" was ranked tops by advisers in schools

with under 200 enrollment (1.40 rating on the 4-point scale). "As a classroom teaching tool" was ranked first by advisers in schools with 200-500 enrollment (1.12 rating) and in those with enrollment over 500 (1.57 rating).

Advisers in the smallest schools ranked "as a classroom teaching tool" second (1.64) and "as an open forum for student expression" third (2.44). Advisers in the medium-sized schools ranked "as a good news publication" second (1.88) and "as an open forum for student expression" third (2.14). Advisers in the largest schools ranked "as an open forum for student expression" second (1.73) and "as a good news publication" third (2.60). "As an extracurricular activity" was rated 2.6 by advisers in the smallest schools, 4.0 by advisers in medium-sized schools, and 3.2 by advisers in the largest schools. Medium- and large-school advisers were closest in their rankings ($r = .8395$), with small- and medium-sized schools next closest ($r = .7532$). There was little correlation between how small- and large-school advisers ranked the purposes ($r = .2766$).

Possible libel was the reason most often given for why material was suppressed. Twelve (44.4%) of the 27 advisers who said they had suppressed material said they had done so because of possible libel. The second-leading cause of suppression by the advisers was "invasion of privacy," which was given as the cause of suppression by 10 of the advisers who said they had censored stories (37.4%). "Too controversial" was the reason given by one-third of the advisers (9), while six advisers (22.2%) stated they had suppressed material for reasons of

obscenity. Other reasons accounted for nine mentions.

There was no statistically significant difference between responses for any two issues except for the issue of privacy. It was given as a reason for censorship by 20% of advisers from schools under 200 students and by 58% of advisers from schools over 500 (chi square = 4.20, C=.367, significant at .05 level). The highest correlation for all responses was a moderate negative correlation between the responses of medium- and large-school advisers (r = -.7001). There was a weak positive correlation between small- and medium-school advisers (r = .4851) and a minimal negative correlation between small- and large-school advisers (r = -.1019).

Advisers were presented with a list of six topics to determine which ones were most-often covered in their newspapers. The percentages of those responding positively were drugs, 53.7%; AIDS and smoking, each 38.9%; sex, 35.2%; and student pregnancy and problems related to divorce and one-parent homes, 24.1%.

There was a statistically significant difference between schools with over 500 students and those under 500 students as to their covering each of the topics except for "smoking." Advisers in the large schools were more likely than those in smaller schools to state that their newspaper covered the other topics. There was no statistically significant difference between the smallest (under 200 students) and medium-sized schools (200 to 500 students) in any topic area, however. Overall, responses by advisers at the small- and medium-sized schools were the most alike. There was a strong correlation (r = .8941) between the

two. The correlations between advisers in the small and large schools (.4484) and between advisers in the middle-size and large schools (.2380) were weak.

While 69.6% of advisers in schools larger than 500 said that sex had been a topic, only 9.6% of advisers in schools smaller than 500 did so. The difference was significant at the .001 level (chi square = 20.76, C = .527, df = 1).

Student pregancy was covered in 56.5% of the largest schools but only 9.7% of schools under 500 enrollment. The difference was significant at the .001 level (chi square = 13.89, C = .452).

The topic of divorce and one-parent homes was covered in 47.8% of the newspapers in schools over 500 but only in 6.4% of the newspapers in schools under 500. The difference was significant at the .001 level (chi square = 12.37, C = .432).

Advisers in 56.5% of schools over 500 students but in only 25.8% of the schools under 500 said they had covered the issue of AIDS. The difference was significant at the .05 level (chi square = 5.24, C = .297).

While 69.6% of advisers in the 23 schools over 500 (16) said their newspapers had written about drugs, only 41.9% of 31 advisers in schools under 500 students (13) had. The difference was significant at the .05 level (chi square = 4.06, C = .264).

While 52.2% of advisers in the schools over 500 said their newspapers had had articles about smoking, only 29% of the advisers in the smaller schools said so. The difference was not statistically significant, however (chi square = 2.98, C = .229).

Some advisers reported outside pressures about contents of their newspapers. Only 20.4% of the 49 advisers responding (10) said they were aware of concern expressed by school board members over newspaper content, but half of the 50 advisers responding to the question (25) said they had received criticism over newspaper or yearbook content from members of the community. There was no statistically significant difference between small and large schools.

Findings Regarding Research Question No. 3

Sixty-six percent (32) of the 48 advisers responding to the question stated that they did not plan to look more closely at the content of the school newspaper because of the Hazelwood decision. Chi square tests showed no statistically significant difference between how advisers in the largest schools (over 500 enrollment) and smallest schools (under 500) responded.

Forty-three of the 50 advisers answering the question (86%) said their principal did not seem to be more interested in the content of the publication since the Hazelwood decision. There was no statistically significant difference between how advisers in schools over 500 and those under 500 responded.

Conclusions

The findings concerning Research Question No. 1 indicated that schools have a variety of means for controlling newspaper content. A stated policy did not seem to be important tool in controlling content. At least two-thirds of advisers said they did not have a stated policy and the school did not have a stated policy. The principal did not appear to use direct control

through prior review of the newspaper, but most advisers did show potentially controversial articles to the principal--usually "as a precaution" and "as a courtesy." Selection of story topics was used only by a small minority of advisers. Most control seemed to be exerted by suggestion with censorship as a last resort.

Thus, Hypothesis 1 was rejected. There was no significant difference between advisers at small and large schools on the questions concerning how advisers oversee the content of the school newspaper. The only statistically significant difference in responses was that advisers at larger schools said that if their schools had a policy, it was more likely to be a written one.

The findings on Research Question 2 indicated that a variety of content was seen as objectionable. A majority of advisers said their newspapers did not cover the topics of AIDS, smoking, sex, and student pregnancy and problems related to divorce and one-parent homes. The only topics which a majority of advisers said their newspaper covered was drugs, and the majority was a small one.

School size did appear to be related to the type of controversial articles that appear in school newspapers. Thus, Hypothesis 2 was not rejected. In all topic areas except for smoking, the number of advisers at schools over 500 enrollment who stated that their newspaper covered the topic was greater than for advisers at schools under 500 enrollment. The three topics for which there was the greatest difference were sex, student pregnancy, and divorce, but there also was a significant

difference for AIDS and drugs. Advisers at larger schools also were less likely to rank "as a good-news publication" higher than "as an open forum" as an important purpose for the newspaper.

The findings on Research Question 3 indicated that the Hazelwood decision will not affect content of school publications. A large majority of advisers said they did not plan to look any more closely at the content of the newspaper, and an even larger majority said their principal did not seem to be more interested in the content of publication.

Thus, Hypothesis 3 was rejected. School size was not related to the adviser saying that the Hazelwood decision would change the way he/she would look at content, nor did school size relate to the adviser having noted increase interest by the principal in newspaper content.

It was suggested in the study of principals[9] that advisers also may be doing their own suppression of controversial issues, which was indicated by the current study. It also was proposed in that study that the extent of censorship depends mainly upon what potentially objectionable articles advisers show principals. The current study suggests that that is the case.

The study of how principals have reacted to the Hazelwood decision suggested one reason why principals may not have increased interest--because they already are interested. An adviser commented upon that possibility:

> The recent decision will have little impact on the content of our school paper. It has always been ultimately controlled by the administration/board.

They pay for it.

Besides principals and advisers, another key player in understanding how the high school press is controlled is the student. It may be that students don't often need to be censored. One adviser stated about that possibility:

> Rarely do I have a student who truly wants to write about a controversial subject. Most never want to subject themselves to peer and community pressure or spend the time gathering needed information.

Future research should look into students' perception of their press freedom following the Hazelwood decision and their attitudes toward printing articles on controversial issues. Future research also should be done to see if advisers' expectations about whether the Hazelwood decision would restrict content were accurate.

Research also should be undertaken to determine other factors that might affect press freedom besides size of school--such as the adviser's background, contents of journalism courses, or community factors. That some advisers may not be as interested in freedom of press, for example, was indicated by this quote by an adviser:

> Our ... classtime is spent covering basic writing skills ..., layout design, ... etc. By the time this is accomplished, there's not much time for controversial matters. We have the purpose of covering what happens. We believe in reporting the news ... not <u>becoming</u> the news.

It may be that one possibly unintended result of the Hazelwood decision is that Freedom of the Press may not only be banned from the high school newsroom but from the high school classroom as well.

NOTES

[1] Student Press Law Center, "Hazelwood School District v. Kuhlmeier: What It Says. What It Means. Where Student Journalism Goes from Here," February 1988.

[2] J. Marc Abrams and S. Mark Goodman, "End of An Era?: The Decline of Student Press Rights in the Wake of the Kuhlmeier Decision." An unpublished paper presented at the AEJMC convention, Portland, Ore., July 1988.

[3] Louis A. Day and John M. Butler, "Hazelwood School District v. Kuhlmeier: A Constitutional Retreat or Sound Educational Policy?" Unpublished paper presented at the AEJMC Convention, Portland, Ore., July 1988.

[4] Don D. Horine, "How Principals, Advisers and Editors View the High School Newspaper," Journalism Quarterly, 43: 339-345 (1966).

[5]Laurence Campbell, "The Role of the High School Newspaper," Quill and Scroll, 45:22 (February-March 1971).

[6] Robert Trager and Donna L. Dickerson, "Prior Restraint in High School: Law, Attitudes and Practice," Journalism Quarterly, 57:135-138 (1980).

[7] Ibid., p. 137.

[8] Thomas V. Dickson, "Attitudes of Missouri High School Principals Concerning Press Freedom After Hazelwood." Journalism Quarterly, 66:170-174 (1989).

[9] Ibid.

TABLE I
RESPONSES OF ADVISERS TO SURVEY QUESTIONS

		Yes	No
1. Do you, as adviser, have a stated policy that guides student writers as to what topics are not to be included in the newspaper? (S=18, M=12 L=22; N=52) [S (small) = under 200, M (medium) = 200-500), L (large) = over 500]	S	28%	72%
	M	25%	75%
	L	41%	59%
	Mean:	33%	67%
	Totals:	17	35
2. Does the school have a policy about what should and should not go into the newspaper? (S=17, M=11, L=20; N=48)		Yes	No
	S	29%	71%
	M	27%	73%
	L	40%	60%
	Mean:	33%	67%
	Totals:	16	32
3. If the school has a policy, is the policy written? (S=10, M=6, L=13; N=29)		Yes	No
	S	0%	100%
	M	0%	100%
	L	46%	54%
	Mean:	21%	79%
	Totals:	6	23
4. If no school policy exists for determining appropriate content, would you support the establishment of a policy? (S=17, M=6, L=15; N=38)		Yes	No
	S	76%	24%
	M	100%	0%
	L	60%	40%
	Mean:	74%	26%
	Totals:	28	10
5. Do you ordinarily submit the newspaper to the principal for his review before publication? (S=19, M=10, L=22; N=51)		Yes	No
	S	26%	74%
	M	20%	80%
	L	9%	91%
	Mean:	18%	82%
	Totals:	9	42
6. Has the principal ever asked you to let him review the entire paper or stories/photos that may be controversial? (S=17, M=12, L=22; N=51)		Yes	No
	S	24%	76%s
	M	8%	92%
	L	9%	91%
	Mean:	14%	86%
	Totals:	7	44
7. Have you ever submitted individual stories or photos to the principal to get his opinion about their suitability? (S=18, M=11, L=20; N=49)		Yes	No
	S	78%	22%
	M	64%	36%
	L	65%	35%
	Mean:	69%	31%
	Totals:	34	15

8. Do you and the newspaper staff discuss possible stories before assignments are made? (S=18, M=11, L=20; N=49)

	Yes	No
S	83%	7%
M	100%	0%
L	100%	0%
Mean:	94%	6%
Totals:	46	3

9. Does the editor determine the topics of stories to be published? (S=21, M=11, L=22; N=54)

	Yes	No
S	10%	90%
M	10%	90%
L	14%	86%
Mean:	11%	89%
Totals:	6	48

10. Have you ever had to suppress a story or photo? (S=19, M=11, L=22; N=52)

	Yes	No
S	58%	42%
M	36%	64%
L	55%	45%
Mean:	52%	48%
Totals:	27	55

11. Have you had to suppress a story or photo during the past 12 months? (S=15, M=10, L=21; N=46)

	Yes	No
S	57%	53%
M	40%	60%
L	29%	71%
Mean:	37%	63%
Total:	17	29

12. What do you see as the purpose(s) of the newspaper? (N=42) [T=Teaching Tool; F=Open Forum; G=Good News Publication; E=Extracurricular Activity]

	T	F	G	E
S	1.64	2.44	1.40	2.60
M	1.12	2.14	1.88	4.00
L	1.57	1.73	2.60	3.20
Mean	1.51	2.03	1.88	3.08

[Pearson R correlations: S-M, r = .7532; M-L, r = .8395; S-L, r = .2766]

13. If you have had to suppress a story of photo, what was the reason? (N=37) [L=Libel; O=Obscenity; P=Invasion of Privacy; C=Too Controversial]

	L	O	P	C
S	50%	14%	14%	21%
M	17%	33%	17%	33%
L	24%	12%	41%	24%
Mean:	32%	16%	27%	24%
Totals:	12	6	10	9

[Pearson R correlations: S-M, r = .4851; M-L, r = -.7001; S-L, r = -.1019]

14. Which of the following subjects has your paper covered since you have been adviser? (N=54. Some had more than one response) [Se=Sex; Dr=Drugs; AI=AIDS; SP=Student Pregnancy; Di=Divorce; Sm=Smoking]

	Se	Dr	AI	SP	Di	Sm
S	2	7	5	2	1	4
M	1	6	3	1	1	5
L	16	16	13	13	11	12
Total:	19	29	21	16	13	21

[Pearson R correlations: S-M = .8941; M-L = .2380; S-L = .4484]

15. The Supreme Court said recently in Hazelwood School District v. Kuhlmeier that "a school need not tolerate student speech that is inconsistent with its basic educational mission." Because of that ruling, do you plan to look more closely at the content of your paper? (S=18, M=11, L=19; N=48)

	Yes	No
S	28%	72%
M	27%	73%
L	42%	58%
Mean:	33%	67%
Totals:	16	32

16. Have you been able to determine that your principal has become more interested in the content of the school newspaper since the Hazelwood decision? (N=50)

	Yes	No
S	5%	95%
M	9%	91%
L	25%	75%
Mean:	14%	86%
Totals:	7	43